

**FILED**  
**8/24/2020**

THOMAS G. BRITTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DARIUS D. YOUNG

CASE NUMBER: 20 CR 543

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about August 21, 2020, at Oak Park, in the Northern District of Illinois, Eastern Division, the defendants violated:

*Code Section*

Title 18, United States Code,  
Sections 1951(a) and 2

*Offense Description*

obstructed, delayed and affected interstate commerce, and the movement of articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b)

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

ALEXIS D. FIGUEROA  
Special Agent, Federal Bureau of Investigation  
(FBI)

Sworn to before me and signed in my presence.

Date: August 24, 2020

*Judge's signature*

City and state: Chicago, Illinois

YOUNG B. KIM, U.S. Magistrate Judge  
*Printed name and Title*

**AFFIDAVIT**

I, Alexis D. Figueroa, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed since 2015. My current responsibilities include the investigation of violent crimes, including, among others, kidnaping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that DARIUS D. YOUNG has violated Title 18, United States Code, Sections 1951(a) and 2. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging YOUNG with obstructing, delaying and affecting commerce, and the movement of articles and commodities in commerce, by robbery, as “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951(b), I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. The information in this Affidavit is based on interviews of witnesses, law enforcement’s interview of YOUNG, my own observations and actions, including observations of surveillance videos, information received from other law enforcement agents, my experience and training, and the experience and training of other agents.

## Summary and Background

4. In summary, the FBI is investigating a series of armed robberies and vehicular carjackings that occurred between August 20, 2020, and August 21, 2020, during which the offenders, including DARIUS D. YOUNG, on multiple occasions (1) forcibly took vehicles from individual victims through the use of a firearm and threats in Chicago and its surrounding suburbs; (2) conducted robberies of individual persons on the street, while armed with a firearm; and, as further set forth below, (3) committed an armed robbery of a commercial UPS carrier occurring in Oak Park, Illinois, on August 21, 2020.

5. The evidence gathered in this investigation to date indicates that these armed robberies and carjackings are connected and were committed by YOUNG and other unknown individuals. During the investigation, law enforcement learned about two vehicular carjackings that occurred in Cicero, Illinois, on August 20, 2020. In the first carjacking, a 2013 Kia with Illinois License Plate BM95992, was forcibly carjacked after the brandishing of a firearm, after the vehicle was boxed in by an unknown grey four-door sedan and an unknown white SUV. A surveillance image captured the following image of the offending four-door grey sedan.



6. Subsequent to the carjacking mentioned above, and also on August 20, 2020, a 2016 Mitsubishi Outlander with Illinois License Plate 2739590, was forcibly carjacked after the brandishing of a firearm by occupants of the aforementioned carjacked 2013 Kia. In both instances, two to three male offenders displayed handguns and forcibly took the vehicles.

***August 21, 2020 Armed Robbery of UPS Truck***

7. On August 21, 2020, Individual A, an employee and driver for United Parcel Service (“UPS”), related that, at approximately 1:21 p.m., he was driving a UPS truck and stopped in front of 1183 S. Highland Avenue in Oak Park, Illinois, in order to make a delivery. Individual A exited the truck, walked to the rear, opened the truck’s large rear door and was getting the order ready when a light-colored car pulled into the open parking spot behind him. Individual A then heard an unknown male voice approach him from behind and state several times words to the effect of, “Get on the ground, stay down.” Individual A complied and laid face down in the street behind the truck. After lying face down on the ground, Individual A looked up and observed what appeared to be the handle of a handgun in the waistband of one of the offenders.

8. While on the ground, Individual A heard several other offenders entering and exiting the rear of the UPS truck. After the vehicle drove away, Individual A went into the UPS truck and discovered that numerous packages were removed. He also observed the light-colored vehicle turning from Highland Avenue,

east onto Roosevelt Avenue. The trunk of the offending vehicle was open and Individual A observed numerous brown boxed packages inside. A later conversation with a representative from UPS revealed that a total of 12 boxes were taken from the UPS truck.

9. While the robbery was taking place, Individual B related that, as he/she parked his/her vehicle in the parking lot of a Dollar Tree located on the corner of Roosevelt Avenue and Highland Avenue, he/she observed a UPS driver lying in the street with several male black offenders jumping in and out of the UPS truck carrying boxes. Individual B then took out a cellular phone and recorded the incident. After recording the incident, Individual B emailed the video to the Oak Park Police Department.

10. Video of the incident recorded by Individual B showed three visible offenders: (1) a male black, average height, thin build, wearing a face mask, dark-colored hooded sweatshirt with a light-colored shirt underneath, and light-colored jeans ("Offender #1); (2) a male black, average height, medium build, wearing a face mask, royal blue-hooded sweatshirt with writing across it and dark blue possible sweat pants with white stripes (Offender #2 subsequently identified as YOUNG); and (3) a male black, taller, heavy build, wearing a face mask, dark blue-hooded sweat shirt and dark blue sweat pants (Offender #3). As shown on the video recording, Offender #1 was standing over the UPS driver as he/she laid in the street. YOUNG and #3 went in and out of the rear of the UPS truck, removing packages from the UPS truck and placing them in the open trunk of a silver Kia Optima four-door sedan

with dark tinted windows. As the three offenders began to enter the passenger seats of the vehicle, the video ended. According to Individual B, the vehicle was driven by a fourth subject. A screen capture of the offending Kia and offenders from Individual B's cellular telephone video is below; Individual A can be seen lying on the ground on his/her stomach:



***Surveillance and subsequent arrest of Xavier Tate and Darius Young***

11. On August 21, 2020, law enforcement received information that a 2016 Mitsubishi Outlander with Illinois License Plate 2739590, which had previously been reported stolen in a carjacking on August 20, 2020, from Cicero as noted above, was

parked and unoccupied on the 5200 block of West Polk Street in Chicago. Law enforcement relocated to the area in order to initiate surveillance.

12. At approximately 6:50 p.m., law enforcement observed a 2012 grey Kia Optima sedan with Illinois License Plate URNOZ, and red Acura TL arriving on the 5200 block of West Polk Street. With knowledge that a similar grey Kia Optima used in the aforementioned robbery in Oak Park on August 21, 2020 and carjacking in Cicero on August 20, 2020, law enforcement approached the Kia Optima. The driver of the 2012 grey Kia Optima, subsequently identified as XAVIER TATE, reversed the vehicle onto a sidewalk in an attempt to flee from law enforcement. TATE then struck a tree while attempting to flee in reverse, which caused the trunk of the Kia Optima to open. The 2012 Kia Optima then drove forward towards the direction of a covert law enforcement vehicle. While the 2012 Kia Optima was still moving forward, TATE exited the vehicle and fled on foot. The Kia Optima then struck a law enforcement vehicle. Law enforcement pursued TATE, and subsequently arrested TATE after observing him drop a dark object which also made a metallic sound upon striking the sidewalk. Law enforcement recovered a firearm from the ground near where TATE appeared to drop the dark object. YOUNG, the front seat passenger, was arrested immediately upon exiting the front passenger door of the 2012 grey Kia Optima. The red Acura TL managed to evade law enforcement after a short pursuit and made good on its escape.

13. Subsequent to the arrest of TATE and YOUNG, law enforcement officers on scene observed numerous brown boxes with UPS tags affixed on them in the trunk

of the 2012 grey Kia Optima. The following are photographs of the grey Kia Optima following the arrest of TATE and YOUNG. The first photograph depicts the grey Kia Optima, and the second photograph depicts the trunk of the grey Kia Optima:





### *Interview of DARIUS YOUNG*

14. Subsequent to YOUNG'S arrest, YOUNG was taken to CPD's 15<sup>th</sup> District. While there, YOUNG was read his *Miranda* warnings, waived them, and agreed to speak with law enforcement. The following details a portion of the statement given by YOUNG, which was audio-video recorded.

15. During the interview, YOUNG stated that on August 21, 2020, he joined other unknown individuals that he knew to forcibly steal cars and rob individuals because he needed money.

16. YOUNG stated that at around 1:00 p.m. that day, he was picked up by the 2012 grey Kia Optima, which was occupied by three individuals. Trailing the 2012

grey Kia Optima was a red Acura occupied by three other individuals. Shortly thereafter, a UPS truck that was making a delivery was identified as a robbery target. The 2012 grey Kia Optima then circled the block a couple of times to get back to where the UPS truck was located. The 2012 grey Kia Optima then parked behind the UPS truck while the red Acura TL parked nearby as a look-out. Two of the individuals in the Kia exited the vehicle. Offender #1 approached Individual A while holding his hands in the pocket of his hoodie. Upon reaching Individual A, Offender #3 gave Individual A a “bear hug” and put Individual A onto the ground. Once on the ground, Offender #1 stood over Individual A and stated words to the effect of, “Don’t move. Stay down.” YOUNG believed Offender #1 had with him a small black 9mm pistol as he stood over the UPS truck driver. At that point, YOUNG explained, Offender #3 and YOUNG began to remove boxes from the truck and into the trunk area of the Kia Optima. Upon filling the trunk of the 2012 grey Kia Optima with boxes from the UPS truck, YOUNG and the other two individuals got back into the 2012 grey Kia Optima and sped away with the trunk of the vehicle open due to the boxes.

17. Upon fleeing the scene of the UPS truck robbery, the 2012 grey Kia Optima and red Acura TL drove to a location to see what was in the UPS boxes. YOUNG stated that the boxes contained items such as granola, toilet paper, and a pair of Jordan shoes. YOUNG went on to state that some of the UPS boxes were kept in the Kia while the remaining boxes were thrown away in a nearby dumpster. YOUNG stated he did not get any of the proceeds from the UPS robbery as the only thing of value were the pair of Jordan shoes, which were not his shoe size. YOUNG

stated that he and the others were going to sell the shoes at a later date and YOUNG was set to receive some of the proceeds from that sale.

18. YOUNG was shown still images from the video of the robbery taken by Individual B. YOUNG identified the 2012 grey Kia Optima pictured in the still image of the video as the car he was in. YOUNG also identified himself in the still images as Offender #2, the individual carrying boxes while wearing a blue sweatshirt and blue sweatpants with a white stripe running vertically on the outside of the pants. Below are side-by-side photographs of still images from the video taken by Individual B (on the left) and a photograph of YOUNG taken by Oak Park detectives subsequent to YOUNG'S arrest (on the right):



### ***UPS Boxes found in Kia Optima***

19. Several brown boxes containing UPS labels were found in the trunk of the 2012 grey Kia Optima. A subsequent review of the UPS truck manifest showed that twelve boxes were stolen during the robbery. Each box contained an insurance policy of \$100 each for a total loss to UPS of \$1,200. A review of the manifest provided by UPS to law enforcement confirmed that at least one of the brown boxes containing a UPS label found within the silver Kia Optima was stolen from the UPS truck on August 21, 2020.

20. Additionally, based on my training and experience, the training and experience of other law enforcement agents and officers with whom I have consulted, as well as open source searches, UPS, which is headquartered in Atlanta, Georgia, is a commercial carrier and multinational package delivery and supply chain management company that moves and ships packages interstate, among other things.

### ***Other robberies and carjacking committed on August 21, 2020 by YOUNG and crew***

21. During the recorded custodial interview, YOUNG chronicled events that occurred subsequent to the UPS robbery but prior to his arrest. YOUNG stated that while in the 2012 grey Kia Optima, YOUNG along with the others committed additional acts including, an armed robbery of an individual leaving a Chase bank in Chicago and a carjacking of a Mazda SUV in Chicago. Inside the 2012 grey Kia Optima, law enforcement recovered a state identification card for the victim of the

armed robbery occurring in front of the Chase Bank in Chicago and a Mazda key fob matching the vehicle stolen in the Chicago carjacking.

**CONCLUSION**

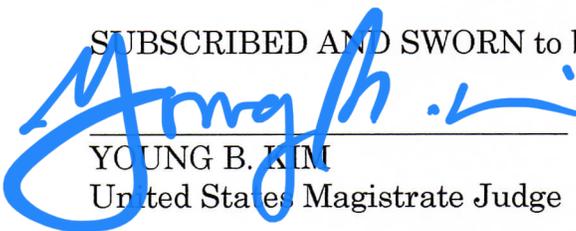
22. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on or about August 21, 2020, DARIUS YOUNG obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, as “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951(b), as it relates to the UPS truck, in violation of Title 18, United States Code, Section 1951 and Section 2.

FURTHER AFFIANT SAYETH NOT.



ALEXIS D. FIGUEROA  
Special Agent, Federal Bureau of  
Investigation

SUBSCRIBED AND SWORN to before me on August 24, 2020.



YOUNG B. KIM  
United States Magistrate Judge